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Subject: ETB Comment

Dear Mr. Sin,

Here's my quick comment regarding ETB.

I do not volunteer to perform oral presentation, but should any of these comments being useful and need clarification or elaboration, I would not hesitate.

Best Regards,
Damien Wong

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- (1) It is not technology neutral, the ordinance assume the infrastructure to ensure secure transaction by means of the establishment of Certificate Authority and the use of digital signature and verification process base on the current Public/Private key technology.
- (2) The ordinance need to address fake key crime, by means of establish rules and guideline to avoid such crime. Such law need to ensure a smooth integration with the existing law to ensure such criminal activities are detectable and to be punished. Such law should align with existing computer law to address issues in the same set.

- (3) Ensure different types of electronic transactions to meet the minimum security standard in order to avoid chaos and mass security attack. It is suggested that per industry or per transaction type or other classification criteria is to be defined in the ETB to ensure any organization who use Post Office CA or becoming a sub-CA would perform trust-worthy electronic transaction. It is to protect both the organization itself and organization or individual who perform electronic with them.

For the classification, say, government and national security at the class A, the banking and financial institution is class B, stock exchange is class C, retail, manufacturingand so on so forth.

Different security requirement and limit of law empowerment of electronic transaction needs to be differentiated at different class.

- (4) Abuse, misuse or stealing the use of private key of other people. Would this be a criminal act ?